

The Honorable Richard A. Jones and  
The Honorable John H. Chun

UNITED STATES DISTRICT COURT FOR THE  
WESTERN DISTRICT OF WASHINGTON  
AT SEATTLE

UNITED STATES OF AMERICA,  
Plaintiff.

NO. CR23-178 RAJ and  
NO. CR23-179 JHC

V.

BINANCE HOLDINGS LIMITED, d/b/a  
BINANCE.COM, and  
CHANGPENG ZHAO, aka “CZ,”  
Defendants.

**NOTICE OF RELATED CASE  
FILED UNDER SEAL**

## I. INTRODUCTION

These cases arise out of a highly complex five-year investigation of the world’s largest cryptocurrency exchange, Binance.com. The investigation revealed that, beginning at its inception in 2017, Binance Holdings Limited (“Binance”), and Binance’s founder and chief executive officer (“CEO”), Changpeng Zhao, failed to comply with U.S. laws requiring them to register Binance.com as a money services business (“MSB”), implement an effective anti-money laundering (“AML”) program, and to comply with U.S. sanctions laws.

1       The United States has reached plea agreements with Zhao and Binance. Pursuant to  
 2 these agreements, the United States filed separate Informations against each Defendant.  
 3 The United States filed separate Informations because the Defendants are pleading to  
 4 different charges. Nevertheless, the charges arise out of the same underlying conduct—  
 5 conduct that was extensive and complex, and requires a thorough understanding of the  
 6 actions of Binance and its officers as well as the legal and regulatory schemes governing  
 7 MSB registration, AML programs, and sanctions. Common questions will be presented in  
 8 both cases at every stage of the cases, including sentencing. Accordingly, the United States  
 9 submits this Notice of Related Cases.

## 10                   II.     DISCUSSION

11       On November 14, 2023, the United States filed a thirty-two-page Information  
 12 charging Binance Holdings Limited with Conspiracy to Conduct an Unlicensed Money  
 13 Transmitting Business and to Fail to Maintain an Effective Anti-Money Laundering  
 14 Program (Count 1), Conducting an Unlicensed Money Transmitting Business (Count 2),  
 15 and violating the International Emergency Economic Powers Act (Count 3). This was  
 16 assigned case number CR23-178 RAJ. On the same day, the United States filed a nine-  
 17 page Information charging Zhao with a single substantive count of Failure to Maintain an  
 18 Effective Anti-Money Laundering Program. This case was assigned case number CR23-  
 19 179 JHC.

20       Local Criminal Rule 13 encourages counsel “to file a notice of related case in order  
 21 to bring such cases to the Court’s attention.” The Court may reassign criminal cases  
 22 pursuant to Local Criminal Rule 13, which provides:

23       (a) **Common Questions.** When criminal cases involving common questions of  
 24 law and fact (but not necessarily the same parties) are assigned to different  
 25 judges, there may be good reason to assign all of said cases to one judge. Such  
 26 may be assigned to the judge to whom the case bearing the earliest filing number  
 27 was assigned, at his or her option.

1       These cases involve multiple common questions of law and fact. Both cases arise  
2 out of the operations of Zhao's company, Binance, and Binance's failure to register with a  
3 U.S. regulator, failure to develop an effective AML program, and failure to ensure that its  
4 platform did not cause illegal transactions between U.S. persons and persons in sanctioned  
5 jurisdictions, as well as Binance's sophisticated attempts to conceal its noncompliance with  
6 U.S. law. The conduct spans at least five years, involves numerous Binance officers and  
7 third parties, millions of users, and billions of transactions valued at trillions of dollars, and  
8 it is governed by the same intricate legal and regulatory framework.

9       The United States has reached plea agreements with both Defendants. These  
10 agreements were negotiated in tandem and are designed to address complex questions  
11 about future monitoring and compliance, as well as the ongoing roles of Binance and Zhao  
12 in the cryptocurrency industry.

13       For these reasons, reassignment to the same judge may be in the interest of judicial  
14 economy. Counsel for Defendants agrees that reassignment is appropriate.

1 DATED this 14th day of November, 2023.  
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3

4 MARGARET A. MOESER  
5 Acting Chief  
6 Money Laundering and Asset Recovery  
7 Section, Criminal Division  
8 U.S. Department of Justice  
9

10 /s Kevin G. Mosley  
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8 /s Michael Dion  
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11 Michael Dion  
12 Assistant United States Attorney  
13  
14

CERTIFICATE OF SERVICE

I hereby certify that on November 14, 2023, I served this filing upon counsel for Defendants by email.

/s Michael Dion  
MICHAEL DION  
Assistant U.S. Attorney  
U.S. Attorney's Office